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## **U.S.** Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York. New York 10007

February 14, 2022

Time to respond extended to April 18, 2022. Conference adjourned from February 28, 2022 to May 6, 2022 at 11 AM, to be held telephonically (Dial-in: 1-888-363-4749; Access code: 3667981).

VIA ECF

Hon. P. Kevin Castel United States District Judge United States District Court 500 Pearl Street New York, New York 10007

SO ORDERED.

Dated: New York, NY February 16, 2022

P. Kevin Castel

United States District Judge

Re: Rahman, et al. v. Mayorkas, et al., No. 21 Civ. 10707 (PKC)

Dear Judge Castel:

This Office represents the government in this action in which the plaintiffs seek an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate their Application to Register Permanent Residence or to Adjust Status (Form I-485) and Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request an on-consent extension of time of sixty-one days to respond to the complaint (*i.e.*, from February 16 to April 18, 2022). I also respectfully request that the initial conference presently scheduled for February 28, 2022, be adjourned by to the week of April 25, 2022, or thereafter.

The extension is respectfully requested because USCIS is in the process of transferring the necessary files to the appropriate field office for further action. The additional time is thus needed for the field office to evaluate the plaintiffs' application and petitions and determine next steps, which may include taking adjudicative action such as the issuance of Requests for Evidence ("RFEs") or interview notices. This is the government's first request for an extension of the deadline to respond to the complaint and an adjournment of the initial conference. The plaintiffs consent to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: <u>s/Michael J. Byars</u>

MICHAEL J. BYARS

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cc: Counsel of record (via ECF)